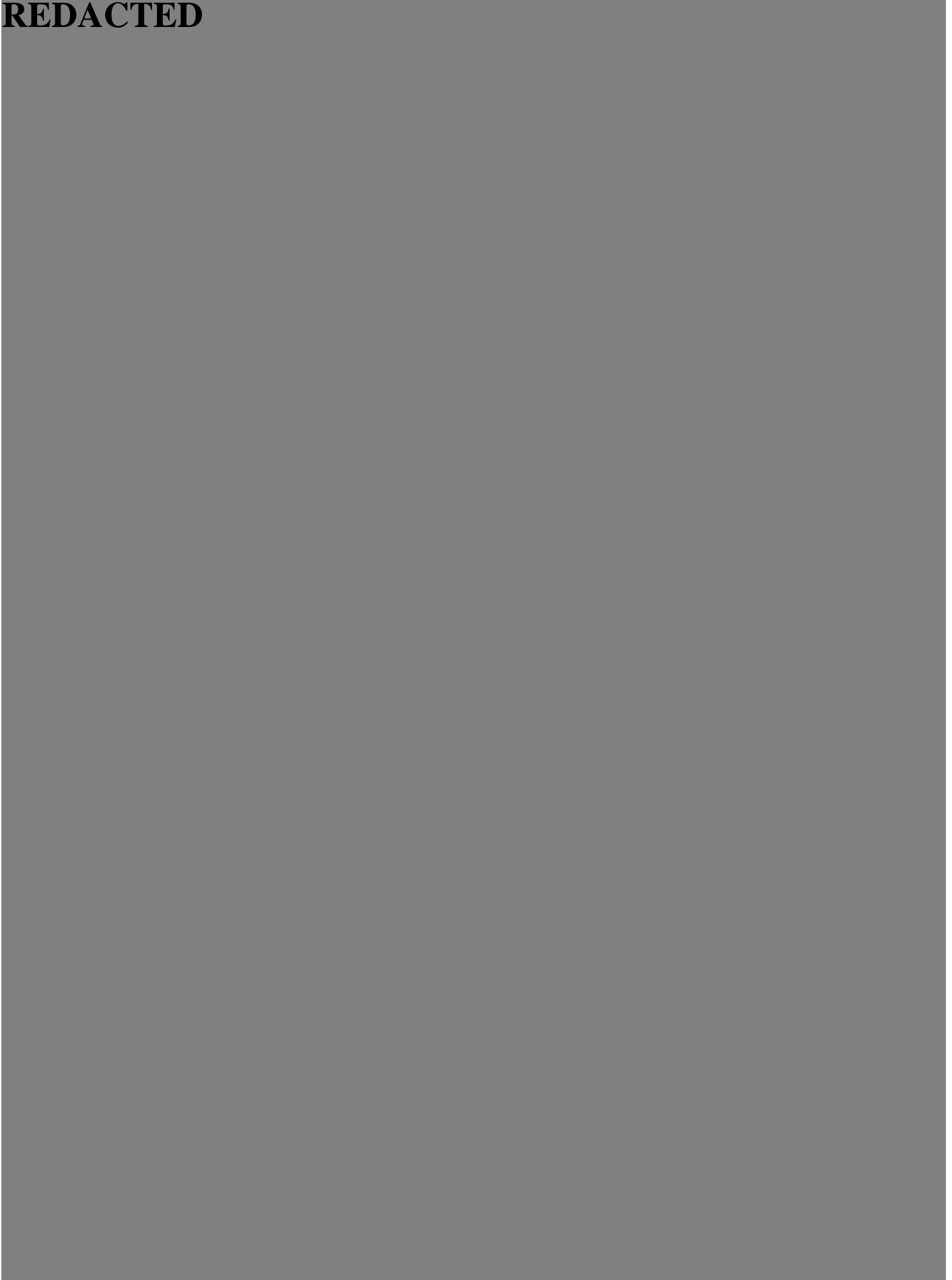# EXHIBIT 357

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1   themselves?
2   A.   They can grab it themselves, correct.
3   Q.   Okay. So does that number -- I think
4   earlier today I asked you what the limit was that
5   would flag any pharmacy item, and I think you
6   didn't remember. Does that 24 jog your memory?
7   A.   No. And it could have been different at
8   the DCs. I don't know what Mt. Vernon would have
9   done compared to Perrysburg.
10   Q.   And you don't remember what Perrysburg
11   did?
12   A.   No, I don't.
13   Q.   Okay. But, anyway, the number generated
14   across any prescription item, according to this
15   policy, was the same?
16   A.   Yes.
17   Q.   Whether it's blood pressure medication,
18   diabetes medication, or controlled substances?
19   A.   Yes. Depending on the query. Perrysburg
20   ran a query for controlled substances, and we ran
21   a separate query for non-pharmacy items. So in
22   reading this, it sounds like they may have just
23   run one query that would show everything over 24
24   SKUs totally. We ran a separate query for
25   controls versus non-pharmacy, and they would have

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1   been different thresholds.
2   Q.   Did you run different queries for
3   controlled versus regular pharmacy?
4   A.   Regular pharmacy would have shown up on
5   the regular report because they weren't controlled
6   substances.
7   Q.   Okay. So you ran a query for front end
8   plus regular pharmacy, and you ran a separate
9   query for controlled?
10   A.   Correct.
11   Q.   Okay. And do you know if that was
12   pursuant to any written policy?
13   A.   I don't know that.
14   Q.   How did you know to do that?
15   A.   Tammy Trumbull, Hensley, who is the admin
16   manager now, was the SAIL coordinator when I took
17   that position over, and that is how she trained
18   me.
19   Q.   Okay. But, anyway, according to the
20   policy, the report is run, and this one is 24
21   units, correct?
22   A.   Yes. On this it is.
23   Q.   Okay. And you don't remember what it was
24   for Perrysburg?
25   A.   No, I don't.

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1   Q.   Do you remember if it was the same or
2   different for front end items and pharmacy
3   items -- excuse me -- front end items and
4   controlled items?
5   A.   Perrysburg versus Mt. Vernon?
6   Q.   No, no. Within Perrysburg, whether or
7   not the trigger number was the same or different
8   for controlled substances versus the pharmacy
9   items and non-controlled?
10   A.   It was different.
11   Q.   Then it goes on to say in the second
12   paragraph, it says, "the computer room or SAIL
13   personnel working the query will review the
14   listing. If there is a questionable quantity, the
15   pharmacy is contacted at that store and the order
16   is questioned." Do you see that?
17   A.   Yes.
18   Q.   It goes on to say, "if the order is
19   incorrect, the original order for the item is
20   deleted and rekeyed correctly." Do you see that?
21   A.   I do see that.
22   Q.   Is this accurately -- and I know this is
23   a Mt. Vernon document -- but is this accurately
24   describing what -- what your process was at
25   Perrysburg?

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1   A.   Not specifically. For controlled C-III
2   through V, if we did have something that got
3   flagged on the overage report, we would contact
4   the store if it looked like it wasn't in line with
5   their normal orders. And if it was a wrong order,
6   we would either delete it or decrease it. But we
7   wouldn't delete it and reenter an order.
8   Q.   Okay. So would it be fair to say that
9   when you called the pharmacy, you were trying to
10   determine whether or not the order had been
11   entered in error?
12   A.   Yes.
13   Q.   So are you familiar with the phrase "fat
14   finger report"?
15   A.   I'm familiar with fat fingering, but not
16   a specific report.
17   Q.   Okay. Okay. So what you're looking for
18   here is fat fingering errors?
19   A.   Yes.
20   Q.   Okay. So you're looking for places where
21   somebody wanted one unit and asked for 100 units?
22   A.   Exactly.
23   Q.   Okay. And those are the type of
24   situations that would flag on this report and that
25   you would make a phone call to the pharmacy about?

33 (Pages 126 to 129)

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1   A.   That's correct.
2   Q.   Okay. Why is that something that was
3   important to the distribution center?
4   A.   We want to make sure that we were sending
5   the orders out the stores needed.
6   Q.   Okay. If you sent an excessive quantity
7   that the store didn't need, would the store often
8   have to return those items?
9   A.   We did not return items at the DC. I
10 don't know what processes the stores would have
11 used. They would have contacted their district
12 office, and then asset protection for their
13 geographical location would have been involved.
14 But they would not have come back to the
15 distribution center.
16   Q.   Okay. Well, some aspect of your job
17 involved returns, right, or trying to lower
18 returns?
19   A.   Not for Rx. Not for pharmacy items.
20   Q.   Okay. So front end items, if you shipped
21 them too many rolls of toilet paper, would those
22 get returned to the distribution center?
23   A.   There's criteria that the products have
24 to meet before we would approve a return. But
25 they would -- we do do that.

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1   Q.   And that's something that you want to
2   avoid; is that fair to say?
3   A.   Yes. Yes.
4   Q.   Okay. And why is it that you want to
5   avoid those types of returns?
6   A.   Well, it doesn't suit the store or the
7   customers or the distribution center or Walgreens
8   in general to have excess stock sitting on the
9   shelves that's not getting sold. If we send too
10 much to one store, we could be shorting another
11 store and missing sales on that.
12   Q.   Okay. So in addition to looking for
13 these fat finger errors, is there anything else
14 that you're looking for when you're reviewing this
15 excessive order report?
16   A.   Not from a sales perspective, no.
17   Q.   At any time -- so let me make sure I
18 understand your process.
19   If you have an order that flags on the
20 excessive order report, that, frankly, is a fat
21 finger report; do you agree with that?
22   A.   Yes.
23   MS. SWIFT: Object to the form.
24   Q.   And so if you have an order that flags on
25 the fat finger report, you make a phone call to

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1   the pharmacy?
2   A.   That's correct.
3   Q.   Okay. You said that you would maybe look
4   at the past ordering history for a store, but I
5   would assume that a lot of times you can see the
6   orders that come in on those fat finger reports
7   and realize they're clearly in error?
8   MS. SWIFT: Object to the form,
9   characterization of the report.
10   A.   So it was very infrequent that we ever
11 actually had to -- or had those items show up on
12 the report. When they did, I don't recall ever
13 actually having to call the store to see if it was
14 correct or not. That's how infrequent it would
15 have been. But, yes, we did check their order
16 history to see if it was something that was
17 regular and average for what the store goes
18 through and orders.
19   Q.   Okay. Give me an example -- or give me
20 an estimate of how often you would have a
21 controlled drug flag on one of these reports.
22   MS. SWIFT: Objection. Calls for
23 speculation.
24   A.   Yeah, I have no idea.
25   Q.   Well, you said it happened very

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1   infrequently. What do you mean by that?
2   A.   I mean, it happened -- I don't recall it
3   ever actually happening. I don't recall ever
4   contacting a store to say, you know, is your C-III
5   through V item, whatever it was, you know, is that
6   a valid order.
7   Q.   Do you recall a C-III through V item ever
8   flagging on this excessive order, fat finger
9   report?
10   A.   I'm --
11   MS. SWIFT: Object to the
12 characterization of the report.
13   A.   So I'm sure that it would have come up,
14 but I don't recall it at all. It was a long time
15 ago.
16   Q.   Okay. Was this -- this process of
17 running this report and looking for these fat
18 finger errors, was that always a part of your
19 duties and responsibilities as a SAIL coordinator?
20   MS. SWIFT: Object to the form of the
21 question.
22   A.   It -- for the C-III through Vs while we
23 distributed them and I was the SAIL coordinator,
24 yes. And for the -- I'm sorry, go ahead.
25   Q.   No --

34 (Pages 130 to 133)